

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

JEAN BOUSTANI, et al.,

Defendants.

No. 18-cr-681 (S-1) (WFK)

**NOTICE OF DEFENDANT JEAN
BOUSTANI'S MOTION *IN LIMINE*
TO PRECLUDE THE GOVERNMENT
FROM REFERRING TO THE
MOZAMBICAN COMPANIES AS
"SHELL COMPANIES" AND THE
INFRASTRUCTURE PROJECTS AS
"FRONTS" DURING TRIAL**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, dated September 13, 2019, Defendant Jean Boustani, by his attorneys, moves before the Honorable William F. Kuntz of the United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York, for an Order granting Defendant's Motion *in Limine* to preclude the government from referring to the Mozambican Companies as "shell companies" and the Infrastructure Projects as "fronts" during trial.

Dated: September 13, 2019
New York, New York

By: /s/ Michael S. Schachter
Michael S. Schachter
Randall W. Jackson
Casey E. Donnelly
Philip F. DiSanto
787 Seventh Avenue
New York, New York 10019-6099
Phone: (212) 728-8000
Email: mschachter@willkie.com

Attorneys for Defendant Jean Boustani